REMARKS

Even if one were to accept the proposition of the office action that one skilled in the art could combine Clough with the Ultimate SafeGuard Easy product, you still have the problem that neither one of them could possibly display a graphical user interface before the system boots. It seems to be the assumption of the Examiner that the interface could come from Clough. But Clough is already booted; that is why he has a graphical user interface.

Perhaps, alternatively, the Examiner assumes that the SafeGuard Easy has a graphical user interface at the timeframe in question. But nothing in the disclosure suggests any such thing. The SafeGuard Easy is an example of full disk encryption software. There is no basis to presume that this ability to display an interface before booting is in the model of the product at the time.
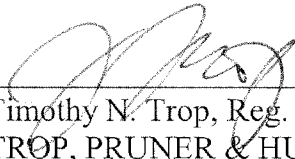
Moreover, the current model of the SafeGuard Easy product apparently uses a trusted platform module. To the extent there is any graphical user interface at the present time, it would be done through the trusted platform module, not through the graphics processor. Thus, it is the trusted platform module that would display the graphical user interface, not the graphics processor. There is no reason to believe that the graphics processor has anything to do with the graphical user interface.

Thus, it is respectfully submitted that there is no basis to conclude that either Clough or the SafeGuard Easy product, at the pertinent timeframe, had a graphical user interface. And, even if they did, there is no reason to presume that the graphics controller had any involvement whatsoever with the comparison step or even with respect to the display of the graphical user interface. In point of fact, it is indisputable that the SafeGuard Easy product would have to work with systems that do not even have a graphics controller. Thus, there is no reason to presume that the graphics controller has anything to do with the display of a graphical user interface, if there even was one.

Therefore, reconsideration is respectfully requested.

Respectfully submitted,

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